

# **EXHIBIT N**

United States District Court  
Southern District Of New York

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VIRGINIA L. GIUFFRE,  
  
Plaintiff,  
v.  
GHISLAINE MAXWELL,  
  
Defendant.  
  
-----X

**15-cv-07433-RWS**

**DEFENDANT GHISLAINE MAXWELL'S  
THIRD SUPPLEMENTAL F.R.C.P. 26(A)(1)(A) DISCLOSURES**

Pursuant to F.R.C.P. 26(a)(1)(A), Defendant Ghislaine Maxwell makes the following disclosures:

**I. IDENTITIES OF INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION RELEVANT TO DISPUTED FACTS ALLEGED WITH PARTICULARITY IN THE PLEADINGS**

1. Ghislaine Maxwell  
c/o Laura A. Menninger, Esq.  
Haddon, Morgan & Foreman, P.C.  
150 E. 10<sup>th</sup> Ave.  
Denver, CO 80203  
303-831-7364  
[LMenninger@HMFLaw.com](mailto:LMenninger@HMFLaw.com)

Ms. Maxwell is the Defendant and may have knowledge concerning matters at issue, including the events of 1999-2002 and the publication of statements in the press in 2011-2015.

2. Virginia Lee Roberts Giuffre  
c/o Sigrid S. McCawley, Esq.  
Boies, Schiller & Flexner LLP  
401 East Las Olas Boulevard, Suite 1200

Miami, Florida 33301  
(954) 356-0011  
[smccawley@bsflp.com](mailto:smccawley@bsflp.com)

Ms. Giuffre is the Plaintiff and has knowledge concerning the matters at issue in her Complaint, including the events of 1996-2015 and the publication of statements in the press in 2011-2015.

3. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] has knowledge about matters at issue, including Plaintiff's whereabouts during 2000-2002 and her false claims concerning Defendant and others.

4. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] has knowledge about matters at issue, including Plaintiff's whereabouts during 2000-2002 and her false claims concerning Defendant and others.

5. [REDACTED]

[REDACTED] has knowledge concerning matters at issue in the Complaint, including events of 1996-2002.

6. [REDACTED]

[REDACTED] has knowledge concerning press statements by Plaintiff and Defendant in 2011-2015 at issue in this matter.

7. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

██████████ has knowledge concerning matters at issue in the Complaint, including her own whereabouts and activities during the period 2000-2002.

8. David Boies  
Boies, Schiller, Flexner LLP  
575 Lexington Ave.  
New York, NY 10022  
(212) 446-2300

Mr. Boies has knowledge concerning matters at issue in the Complaint and in Plaintiff's pleadings and sworn statements in other litigations, including in particular her publicly filed allegations concerning Defendant and ██████████

9. Laura Boothe  
The Mar-a-Lago Club, LC.  
1100 South Ocean Boulevard,  
Palm Beach, FL 33480

Ms. Boothe has knowledge concerning matters at issue, including the date that ██████████ began working at the Mar-a-Lago Club, and the human resources department at Mar-A-Lago.

10. Evelyn Boulet  
Address unknown at this time  
Telephone number unknown at this time

Ms. Boulet may have knowledge concerning Plaintiff's false claims against Defendant.

11. ██████████  
Address unknown at this time  
Telephone number unknown at this time

██████████ has knowledge concerning Plaintiff during the relevant time period including claims for damages, motive and bias.

12. ██████████  
Address unknown at this time

██████████ has knowledge concerning Plaintiff's credibility, including false claims of sexual assault.

13. ██████████  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant.

14. Paul Cassell  
383 South University Street  
Salt Lake City, UT 84112  
801-585-5202  
[paul.cassell@law.utah.edu](mailto:paul.cassell@law.utah.edu)

Mr. Cassell has knowledge concerning press statements by Plaintiff, Plaintiff's court pleadings, and Plaintiff's sworn testimony.

15. Sharon Churcher

[REDACTED]  
Ms. Churcher has knowledge concerning matters at issue, including Plaintiff's statements regarding Defendant and others.

16. Alexandra Cousteau  
Address unknown at this time  
Telephone number unknown at this time

Ms. Cousteau may have knowledge concerning Plaintiff's false claims against Defendant and others.

17. [REDACTED]

[REDACTED] has knowledge concerning Plaintiff's false statements to the press, in court pleadings, and in sworn testimony, at issue in this matter.

18. [REDACTED]

[REDACTED] has knowledge about matters at issue, including Plaintiff's whereabouts during 2001 and her claimed damages.

19. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant.

20. Bradley Edwards  
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.  
425 N. Andrews Ave., Suite 2  
Ft. Lauderdale, FL 33301  
(954) 524-2820  
[brad@pathtojustice.com](mailto:brad@pathtojustice.com)

Mr. Edwards has knowledge concerning Plaintiff's false statements to the press, in court pleadings, and in sworn testimony at issue in this matter. Mr. Edwards also has knowledge concerning "Victim's Refuse Silence, Inc."

21. Amanda Ellison  
Address unknown at this time  
561-628-4338

Ms. Ellison has knowledge concerning Plaintiff's false allegations concerning Defendant.

22. [REDACTED]

[REDACTED] has knowledge concerning Plaintiff's false allegations concerning Defendant.

23. Jeffrey Epstein  
c/o Tonja Haddad Coleman, Esq.  
315 SE 7th Street, Suite 301  
Fort Lauderdale, FL 33301  
(954) 467-1223

Mr. Epstein has knowledge concerning Plaintiff's false statements to the press and in court pleadings, as well as the events of 1999-2002 concerning Plaintiff and Defendant.

24. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant.

25. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant.

26. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant and others.

27. [REDACTED]  
Address unknown at this time

[REDACTED] may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002

28. [REDACTED]

[REDACTED] has knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

29. [REDACTED]

[REDACTED] may have knowledge concerning travel of [REDACTED]

30. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning Plaintiff whereabouts during 2000-2002 and her false claims against Defendant.

31. Meg Garvin  
Lewis & Clark Law School

10015 S.W. Terwilliger Boulevard MSC 51  
Portland, Oregon 97219

Ms. Garvin has knowledge concerning matters at issue including Victims Refuse Silence and Plaintiff's damages.

32. Sheridan Gibson-Butte

Address unknown at this time

Telephone number unknown at this time

Ms. Gibson-Butte may have knowledge concerning Plaintiff's false claims against Defendant.

33. [REDACTED]

[REDACTED] is may have knowledge concerning matters at issue, including Plaintiff's activities during 2002-2016 and her damages allegations.

34. [REDACTED]

[REDACTED] may have knowledge concerning matters at issue, including the publication of statements in the press in 2011-2015 concerning Plaintiff and Defendant.

35. Fred Graff

Address unknown at this time

Telephone number unknown at this time

Mr. Graff may have knowledge concerning Plaintiff's false claims against Defendant.

36. [REDACTED]

Address unknown at this time

Telephone number unknown at this time

[REDACTED] may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

37. [REDACTED]



[REDACTED]

[REDACTED] may have knowledge concerning matters at issue.

38. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant.

39. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant.

40. Brittany Henderson  
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.  
425 N. Andrews Ave., Suite 2  
Ft. Lauderdale, FL 33301

Ms. Henderson has knowledge concerning matters at issue including Victims Refuse Silence and Plaintiff's damages.

41. Brett Jaffe  
Address unknown at this time  
Telephone number unknown at this time

Mr. Jaffe has knowledge concerning Plaintiff's false claims concerning Ms. Maxwell including her compliance with any deposition subpoena in the CVRA matter.

42. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

43. Dr. Karen Kutikoff  
12957 Palms W Drive #101

Loxahatchee, FL 33470

Dr. Kutifkoff may have knowledge concerning matters at issue, including Plaintiff's whereabouts during 1998-2002 and Plaintiff's damages.

44. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant.

45. Tony Lyons  
Skyhorse Publishing, Inc.  
307 West 36th Street, 11th Floor  
New York, NY 10018

Mr. Lyons may have knowledge concerning matters at issue, including Plaintiff's false allegations concerning Defendant and others.

46. [REDACTED]

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant.

47. [REDACTED]

[REDACTED] has knowledge concerning Plaintiff's honesty and truthfulness.

48. [REDACTED]

[REDACTED] may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

49. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant and others.

50. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant.

51. David Mullen  
Address unknown at this time  
Telephone number unknown at this time

Mr. Mullen may have knowledge concerning Plaintiff's false claims against Defendant.

52. Joe Pagano  
Address unknown at this time  
Telephone number unknown at this time

Mr. Pagano may have knowledge concerning Plaintiff's false claims against Defendant.

53. Mary Paluga  
Address unknown at this time  
Telephone number unknown at this time

Ms. Paluga may have knowledge concerning Plaintiff's false claims against Defendant.

54. J. Stanley Pottinger

[REDACTED]

Mr. Pottinger may have knowledge concerning matters at issue, including Plaintiff's attempts to sell her story to the media and her contacts with the media.

55. Joseph Recarey

[REDACTED]

Mr. Recarey may have knowledge concerning Plaintiff's false claims against Defendant.

56. Michael Reiter

[REDACTED]

Mr. Reiter may have knowledge concerning Plaintiff's false claims against Defendant.

57. Jason Richards

Federal Bureau of Investigations  
Address unknown at this time

Mr. Richards has knowledge concerning matters at issue, including Plaintiff's statements concerning Defendant, [REDACTED] and other individuals.

58. [REDACTED]

Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant and others.

59. [REDACTED]

[REDACTED]

[REDACTED] may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

60. [REDACTED]

[REDACTED]

[REDACTED] has knowledge concerning Plaintiff's civil claims against Jeffrey Epstein.

61. Forest Sawyer

Address unknown at this time  
Telephone number unknown at this time

Mr. Sawyer may have knowledge concerning Plaintiff's false claims against Defendant.

62. Doug Schoettle

Address unknown at this time  
Telephone number unknown at this time

Mr. Schoettle may have knowledge concerning Plaintiff's false claims against Defendant.

63. [REDACTED]  
Address unknown at this time  
Telephone number unknown at this time

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant.

64. Mark Tafoya  
Address unknown at this time  
Telephone number unknown at this time

Mr. Tafoya may have knowledge concerning Plaintiff's false claims against Defendant.

65. Brent Tindall  
Address unknown at this time  
Telephone number unknown at this time

66. [REDACTED]  
Address unknown at this time

[REDACTED] has knowledge concerning Plaintiff's credibility, including false claims of sexual assault.

67. Ed Tuttle  
Address unknown at this time  
Telephone number unknown at this time

Mr. Tuttle may have knowledge concerning Plaintiff's false claims against Defendant.

68. Emma Vaghan  
Address unknown at this time  
Telephone number unknown at this time

Ms. Vaghan may have knowledge concerning Plaintiff's false claims against Defendant.

69. Kimberly Vaughan-Edwards  
Address unknown at this time  
Telephone number unknown at this time  
Believed to be in the UK

Ms. Vaughan-Edwards has knowledge concerning facts relevant to this dispute and Ms. Maxwell's character.

70. Cresenda Valdes

Address unknown at this time

Telephone number unknown at this time

Ms. Valdes may have knowledge concerning Plaintiff's false claims against Defendant.

71. [REDACTED]

Address unknown at this time

Telephone number unknown at this time

[REDACTED] may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

72. Maritza Vazquez

Address unknown at this time

Telephone number unknown at this time

Ms. Vazquez may have knowledge concerning Plaintiff's false claims against Defendant.

73. Vicky Ward

Address unknown at this time

Telephone number unknown at this time

Ms. Ward may have knowledge concerning Plaintiff's false claims against Defendant.

74. Jarred Weisfeld

Address unknown at this time

Mr. Weisfeld may have knowledge concerning matters at issue, including Plaintiff's attempted publication of false allegations concerning Defendant and others.

75. [REDACTED]

[REDACTED] may have knowledge concerning Plaintiff's false claims against Defendant.

76. [REDACTED]

Address unknown at this time

██████████ may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

\_\_\_\_\_ has knowledge concerning Plaintiff's false statements to the press, in court pleadings, and in sworn testimony as well as the events of 1999-2002.

80. Any other witness learned through the discovery process.

**II. DOCUMENTS, DATA, COMPILATIONS AND TANGIBLE THINGS IN POSSESSION, CUSTODY OR CONTROL OF DEFENDANT THAT MAY BE USED TO SUPPORT DEFENDANT'S CLAIM OR DEFENSES**

2. News articles from the internet:

c. “Unsavory association: How Robert Maxwell's daughter 'procured young girls' for Prince Andrew's billionaire friend,” *Daily Mail Online* (Mar. 5, 2011).

- d. "Virginia Roberts' account of the explosive Prince Andrew 'sex slave' drama," *Daily Mail Online* (Jan. 3, 2015).
  - e. "Court papers put daughter of Robert Maxwell at centre of 'sex slave' scandal," *The Guardian* (Jan. 4, 2015).
  - f. "Prince Andrew denies sexual abuse allegations in unprecedented Buckingham Palace statement: The Duke of York denies having relations with alleged 'sex slave,'" *The Independent* (Jan. 4, 2015).
  - g. "Prince Andrew story runs and runs - but editors should beware," *The Guardian* (Jan. 5, 2015).
  - h. "US lawyer sues in Prince Andrew sex claims case," *Time* (Jan 6, 2015).
  - i. "Harvard professor Alan Dershowitz denies charges of sex with underage girl," *Boston Globe* (Jan. 22, 2015).
  - j. "Virginia Roberts's Aunt Reveals Jeffrey Epstein Girl Says I Am In Fear for My Life," *Daily Mail Online*, (Jan. 10, 2015).
  - k. "EXCLUSIVE: Alleged 'sex slave' of Jeffrey Epstein, Prince Andrew accused two men of rape in 1998, but was found not credible," *NY Daily News* (Feb. 23, 2015).
  - l. "Jeffrey Epstein accuser was not a sex slave, but a money-hungry sex kitten, her former friends say," *NY Daily News* (Mar. 1, 2015).
  - m. "Twat Claims She Was Underage Sex Slave Bedding Prince Andrew," <http://www.mgtowhq.com/viewtopic.php?f=2&t=6676> (Jan. 5, 2015).
  - n. "Exclusive: Prince Andrew at Heidi Klum's 'Hookers and Pimps' party with the New York socialite accused of procuring underage girls for his billionaire pedophile friend" *Daily Mail Online* (May 10, 2016).
3. Email from [REDACTED] to various news organizations, Subject: "Ghislaine Maxwell," (Jan. 2, 2015).
  4. "Lawyers Acknowledge Mistake In Filing Sexual Misconduct Charges Against Professor Dershowitz," Joint Statement of Brad Edwards, Paul Cassell and Alan Dershowitz (Apr. 8, 2016).
  5. *Edwards and Cassell v. Dershowitz*, In the Circuit Court of the Seventeenth Judicial District In and For Broward County Florida to include:



- a. Deposition testimony of Paul G. Cassell, dated October 16, 2015 and October 17, 2015.
6. *Jane Doe #1 and #2 v. United States*, U.S. District Court for the Southern District of Florida, 08-cv-80736-KAM pleadings to include:
  - a. Motion for Limited Appearance, Consent to Designation and Request to Electronically Receive Notices of Electronic Filing (July 28, 2008) (Doc. # 16)
  - b. Notice of Change of Address and Firm Affiliation (Apr. 9, 2009) (Doc. # 37)
  - c. Order Denying Petitioners' Motion to Join Under Rule 21 and Motion to Amend Under Rule 15 (Apr. 7, 2015) (Doc. #324)
  - d. Order Scheduling Settlement Conference Before the Magistrate Judge, U.S. District Court (Mar. 31, 2016) (Doc. #378)
7. *Epstein v. Scott Rothstein and Bradley J. Edwards*, In the Circuit Court of the Fifteenth Judicial Circuit in and for Palm Beach County, Florida, 09-ca-040800, pleadings to include:
  - a. Complaint (Dec. 7, 2009).
8. Law enforcement records obtained from the Palm Beach County (Florida) Sheriff's Office, the Royal Palm Beach (Florida) Police Department, the County Court in and for Palm Beach County (Florida), the Greenacres (Florida) Department of Public Safety, and the Fremont County (Colorado) Sheriff's Office.
9. Employment records obtained from ET Employment Training and Recruiting Australia.
10. Education records obtained from Royal Palm Beach Community High School and Forest Hills High School.
11. Documents received from Palm Beach County Library System.
12. Documents received from any other party through disclosures and/or in discovery, including any deposition exhibits, will not be identified or produced, though they technically may fall within this category "II", and Defendant reserves the right to utilize such documents at any hearing or trial on this matter.

Defendant reserves the right to identify additional documents, data, compilations and tangible things as discovery continues and to supplement this list accordingly.

**III. DESCRIPTION OF CATEGORIES OF DAMAGES SOUGHT AND COMPUTATION OF ECONOMIC DAMAGES CLAIMED BY THE DISCLOSING PARTY**

Not applicable at this time Ms. Maxwell reserves her right to supplement these disclosures as necessary.

**IV. INSURANCE AGREEMENT UNDER WHICH ANY PERSON CARRYING ON AN INSURANCE BUSINESS MAY BE LIABLE TO SATISFY A PART OR ALL OF A JUDGMENT**

Ms. Maxwell's AIG Homeowners and Excess Liability insurance policies. Coverage has been denied by AIG, as their letter of April 18, 2016 to Ms. Maxwell, copied to Ms. McCawley, attests.

Dated: June 17, 2016.

Respectfully submitted,

*s/ Laura A. Menninger*

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Laura A. Menninger

Jeffrey S. Pagliuca

HADDON, MORGAN AND FOREMAN, P.C.

150 East 10<sup>th</sup> Avenue

Denver, CO 80203

Phone: 303.831.7364

Fax: 303.832.2628

[lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)

[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)

*Attorneys for Ghislaine Maxwell*

## CERTIFICATE OF SERVICE

I certify that on June 17, 2016, I electronically served this *DEFENDANT GHISLAINE MAXWELL'S THIRD SUPPLEMENTAL F.R.C.P. 26(A)(1) DISCLOSURES* via e-mail on the following:

Sigrid S. McCawley  
Meredith Schultz  
BOIES, SCHILLER & FLEXNER, LLP  
401 East Las Olas Boulevard, Ste. 1200  
Ft. Lauderdale, FL 33301  
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